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Robert W. Quinn, Jr.
Director - Federal Government Affairs

Suite 1000
1120 20th St., NW
Washington, DC 20036
202 457-3851
FAX 202 457-2545

April 8, 1998

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

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APR - 8 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Ex Parte
Application by BellSouth Telecommunications, Inc. and BellSouth Long
Distance, Inc. for Provisioning of In-Region, interLATA Service in South
Carolina, CC Docket No. 97-208

Dear Ms. Roman Salas:

On Tuesday April 7, 1998, Harry Davidow, Eileen Halloran, Linda Scalley, Kathy Siefried, Richard Rubin and I of AT&T met with Carol Matthey, Michael Pryor, Jordan Goldstein, Jonathan Askin, Wendy Lader, David Kirschner, Bill Bailey, Jake Jennings, Katherine Shroder, Lisa Choi, Jason Oxman, Brent Olsen, and Radhika Karmarker of the Policy and Planning Division of the Common Carrier Bureau and Patrick DeGraba of the Office of Plans and Policy. The purpose of this meeting was to discuss AT&T's views on the status of Bell Atlantic's compliance with checklist items contained in Section 271 of the Communications Act of 1934, as amended. Attached is a summary that AT&T provided and used during its presentation.

Two copies of this Notice are being submitted on the next business day to the Secretary of the FCC in accordance with Section 1.1206(a)(1) of the Commission's rules.

Sincerely,

Attachments

cc:	M. Pryor	J. Goldstein
	K. Shroder	L. Choi
	J. Askin	P. DeGraba
	D. Kirschner	B. Bailey
	J. Oxman	W. Lader
	R. Karmarker	C. Matthey
	J. Jennings	B. Olsen

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BELL ATLANTIC-NEW YORK

271 Application Status

AT&T Presentation to FCC

April 7, 1998

Overview

- BANY's Public Pronouncements Overstate Its Capabilities
- BANY Does Not Reliably Provide Many Basic Checklist Items
- UNE Combinations

BANY's Poor Checklist Compliance

- BANY Needs To Spend More Time On The Basics Of Serving CLECs
 - Interconnection/Collocation
 - Unbundled Loops
 - Local Switching
 - Number Portability
 - OS/DA
 - OSS

Interconnection

- BANY's performance falls short of its provisioning objectives
- Two-way trunking, with appropriate compensation is not available
- 64 Clear Channel remains in doubt
- Trunk blockage data are needed
- NDR intervals need fixed, shorter timelines
- Access to advanced networks is needed

Collocation

- Collocation must always be an option, not a requirement
- BANY has severe space limitations
 - Space availability/allocation issues
 - Costs for space conditioning
- BANY's performance, esp. for virtual collocation, has not been demonstrated
- Remote testing should not be required for virtual collocation

Unbundled Loops

- BANY's performance in provisioning loops and hot cuts is poor and declining
- BANY has resisted AT&T's efforts to obtain T1 loops for Digital Link
- CLECs need assurances they can obtain loops capable of supporting xDSL

Local Switching

- BANY has refused to provide SMDI
- Firm provisioning intervals are needed
- CLECs need standard intervals for creation of office dialing plans

Account Management

- CLECs need more than mere process improvement:
 - Faster problem resolution
 - Less escalation
 - More input into account manager evaluation
- Change control processes are needed for all aspects of BANY/CLEC interactions

OS/DA/911

- Restrictions on use of DA information
- Lack of standard electronic format for DA listing data
- Only BANY retail listings provided for CLEC end users
- No process for timely DA updates
- Lack of clear CLEC responsibilities for 911 and LIDB updates

Other Basic Checklist Issues

- Poles/Ducts/ROW
- Local Transport
- Databases and Signaling
- Reciprocal Compensation
- White Pages

Number Portability

- CLECs continue to have difficulty in obtaining timely INP
- BANY has made it difficult to obtain number portability for AT&T Digital Link
 - Initial access to numbers in DID blocks
 - Delays in obtaining INP
 - Interface problems for LNP
 - Manual processing requirements

OSS Issues

- The NY PSC collaborative process has been invaluable
- BANY's obligations regarding UNE combinations must be settled before the collaborative can be completed
- Technical issues still remain
 - Specifications need clarification
 - System versions must be settled

OSS Issues

- Meaningful testing of BANY's systems cannot occur until all these issues have been
 - resolved through negotiation in the collaborative (or decided by the PSC)
 - incorporated in Baseline Documentation and
 - implemented in software code
- Any test must include a review of all CLEC entry strategies and all BANY legacy systems and processes, including billing

Performance Measurements

- BANY has not timely produced information on all measurements it committed to in the NY collaborative
- Measurement process in NY PSC staff pre-filing statement is inadequate

UNE Combinations

- All technically feasible forms of UNE combinations must be available at the CLEC's discretion (for any or all UNEs) at cost-based rates
 - Recent change memory systems
 - Direct access to MDF
- BANY has avoided providing combinations by raising “policy” issues

UNE Combinations

- No restrictions on the availability of UNE-P
 - Geographic
 - Customer class
- No “glue” charges
- Any disconnection of UNEs at the ILEC’s discretion must use the least disruptive means available